

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

July 11, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David A. Buff
KBN Engineering & Applied Sciences, Inc.
1034 N.W. 57th Street
Gainesville, Florida 32605

Re: Cargill Fertilizer, Inc.
No. 8 & 9 Sulfuric Acid Plant Expansion
Permit File No. AC29-241660, PSD-FL-209

Dear Mr. Buff:

The Department has received the application for an increase in the No. 8 (2500 to 2900 tons per day) and No. 9 (2800 to 3200 tons per day) sulfuric acid plant production rates of the existing facility at the Cargill's Riverview Plant in Hillsborough County. Based on our initial review of the proposed project, we have determined that additional information is needed in order to continue processing this application package. Please submit the information requested below to the Department's Bureau of Air Regulation:

1. Please explain the reasons for not conducting an annual compliance test for the No. 9 sulfuric acid plant in 1993. If the test was conducted, please submit the results for the same.
2. Based on the compliance test results submitted for the No. 8 and 9 sulfuric acid plants, the weighted averages of the sulfur dioxide emissions in lb/ton are 2.72 and 3.11 respectively. Please explain the reasons for not being able to comply with an emission limit of 3.71 lb/ton after actual modifications to the plant are performed to achieve the higher production rates?
3. Even though the emissions increase from the No. 8 and No. 9 H₂SO₄ plants combined is the same as the emissions increase modeled for the No. 9 H₂SO₄ plant in the original application, this does not necessarily mean that the air quality analysis presented in this application remains unchanged. There are slight differences in the stack parameters of the No. 8 and No. 9 H₂SO₄ plants. Screening modeling of the existing and


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future conditions of these two plants combined shows predicted impacts from the proposed new combination (No. 8 at 2900 TPD and No. 9 at 2800 TPD) are greater than those modeled in the original application (No.8 at 2500 TPD and No. 9 at 3200 TPD). Since the original analysis shows predicted exceedances of the 24-hour and 3-hour SO₂ ambient air quality standards within Cargill's significant impact area, please provide more assurance that Cargill's amended project will not significantly contribute to any predicted SO₂ exceedances.

4. Please explain the procedures for monitoring sulfuric acid production at Cargill. The response to this incompleteness should include, but not be limited to, providing information on the number of control rooms the facility has for sulfuric acid plants, whether each plant has its own totalizer system, and whether a combined totalizer system can be set up to monitor No. 8 and 9 H₂SO₄ plants. Also, explain if the totalizer reading is corrected to 100 percent H₂SO₄ reading by the operator in the control room, or if some other procedure is followed. If the latter, please describe the procedure.

The Department will resume processing this application after we receive the requested information. Should you have any questions, please contact Syed Arif (engineering) or Cleve Holladay (modeling) at 904-488-1344 or write to me at the above address.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Air Permitting & Standards

cc: B. Thomas, SWD
J. Campbell, HCEPC
E. Curran, Cargill
J. Harper, EPA
J. Bunnak, NPS

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 Gainesville, FL 32605

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PS Form 3800, JUNE 1991